THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Magistrate No. 25-624

[UNDER SEAL]

SHAWN MONPER

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Ryan Chrobak, being duly sworn, hereby depose and state the following:

I. <u>INTRODUCTION</u>

- 1. This affidavit is made in support of a criminal complaint charging SHAWN MONPER ("MONPER") with Influencing, Impeding or Retaliating against a Federal Official and a Federal Law Enforcement Officer, in violation of Title 18, United States Code, Section 115(a)(1)(B).
- 2. I have served as a Federal Bureau of Investigation ("FBI") Special Agent since June of 2016. As a Special Agent with the FBI, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18.
- 3. I am currently assigned to the New Castle Resident Agency in the FBI Pittsburgh Division. In this capacity, I am charged with investigating possible violations of federal criminal law. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including functioning as a case agent on violent crime investigations. I have received training and have gained experience in the conduct of federal criminal investigations, the execution

of federal search warrants and seizures and arrest warrants, and the identification and collection of computer-related evidence.

- 4. The facts set forth in this affidavit are based on my personal knowledge, the knowledge obtained during my participation in this investigation, the knowledge obtained from other individuals, including other law enforcement personnel, review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the criminal complaint, this affidavit does not set forth each and every fact that I have learned during the course of this investigation. However, I have not omitted any fact that may tend to undermine a finding of probable cause.
- 5. For the reasons set forth below, there is probable cause to believe that, on or about February 17, 2025, in the Western District of Pennsylvania, the defendant, SHAWN MONPER, did threaten to assault and murder a United States Official; that is, President Donald J. Trump and the heads of executive branches, with intent to impede, intimidate, interfere with, and retaliate against the United States officials while they were engaged in, and on account of, the performance of their official duties by communicating, "Nah, we just need to start killing people, Trump, Elon, all the heads of agencies Trump appointed, and anyone who stands in the way. Remember, we are the majority, MAGA is a minority of the country, and by the time its time to make the move, they will be weakened, many will be crushed by these policies, and they will want revenge too. American Revolution 2.0."
- 6. For the reasons set forth below, there is also probable cause to believe that, on or about March 4, 2025, in the Western District of Pennsylvania, the defendant, SHAWN MONPER,

did threaten to assault and murder a United States Official; that is, President Donald J. Trump, with intent to impede, intimidate, interfere with, and retaliate against the United States official while he was engaged in, and on account of, the performance of his official duties by communicating, "im gonna assassinate him myself".

- 7. For the reasons set forth below, there is also probable cause to believe that, on or about March 18, 2025, in the Western District of Pennsylvania, the defendant, SHAWN MONPER, did threaten to assault and murder a federal law enforcement officer; that is, U.S. Immigration and Custom Enforcement (ICE) agents, with intent to impede, intimidate, interfere with, and retaliate against the federal law enforcement officers while they was engaged in, and on account of, the performance of their official duties by communicating, "ICE are terrorist people, we need to start killing them".
- 8. For the reasons set forth below, there is also probable cause to believe that, on or about April 1, 2025, in the Western District of Pennsylvania, the defendant, SHAWN MONPER, did threaten to assault and murder a federal law enforcement officer; that is, U.S. Immigration and Custom Enforcement (ICE) agents, with intent to impede, intimidate, interfere with, and retaliate against the federal law enforcement officers while they was engaged in, and on account of, the performance of their official duties by communicating, "If I see an armed ice agent, I will consider it a domestic terrorist, and an active shooter and open fire on them".

II. <u>STATUTORY PROVISIONS</u>

9. Title 18, United States Code, Section 115(a)(1)(B), criminalizes threats to assault or murder United States officials and federal law enforcement officers with the intent to impede, intimidate, or interfere with such officials or law enforcement officers while engaged in the performance of official duties, or with intent to retaliate against such officials or law enforcement

officers on account of the performace of official duties.

- 10. For purposes of a violation of $\S 115(a)(1)(B)$:
- a. "United States official" includes the President of the United States and a member of the executive branch who is the head of a department listed in 5 U.S.C § 101.¹ 18 U.S.C. § 115(c)(4).
- b. "Federal law enforcement officer" includes "any officer, agent, or employee of the United States authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of any violation of Federal criminal law." 18 U.S.C. § 115(c)(1).
- 11. U.S. Immigration and Custom Enforcement (ICE) agents are agents of the United States authorized by law to investigate and enforce federal immigration laws to preserve national security and public safety. Therefore, ICE agents are "federal law enforcement officers" for purposes of Title 18, United States Code, Section 115.

III. PROBABLE CAUSE

- 12. The allegations in this criminal complaint pertain to recent threats using electronic communication services by MONPER, who resides in the Western District of Pennsylvania. While some of the actions described in this affidavit relate to very recent conduct, other actions have occurred in the months prior to the investigation of MONPER by the FBI.
- 13. On April 8, 2025, the FBI National Threat Operations Section (NTOS) Exigent Threat Research and Analysis Crisis Team received an emergency disclosure of information from

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¹ The Executive departments are: The Department of State, The Department of the Treasury, The Department of Defense, The Department of Justice, The Department of the Interior, The Department of Agriculture, The Department of Commerce, The Department of Labor, The Department of Health and Human Services, The Department of Housing and Urban Development, The Department of Transportation, The Department of Education, The Department of Veterans Affairs, The Department of Homeland Security. 5 U.S.C § 101.

Google containing customer records and stored content of communications regarding YouTube² user "Mr Satan", who has posted threats towards United States officials, federal law enforcement, and others. The comments provided by Google occurred between January 15, 2025, and April 5, 2025. Google also provided the subscriber information associated with Mr Satan, which included MONPER's name, e-mail address, and phone number.³

- 14. On April 9, 2025, an Emergency Disclosure Request (EDR) was submitted to the internet service provider for the IP address associated with login activity for Mr Satan. The service provider confirmed that the IP address is associated with MONPER's known residence in the Western District of Pennsylvania.
- 15. Also on April 9, 2025, your affiant queried MONPER's identifiers using a reliable law enforcement database, which revealed that MONPER's driver's license identified the same residential address as the one provided by the internet service provider. Accordingly, your affiant submits that MONPER is the Google account holder who has posted the threats to assault and murder United States officials and federal law enforcement officers using Mr Satan's YouTube account.
- 16. Shortly following President Trump's inauguration, MONPER sought a firearms permit through the Pennsylvania State Police. Your affiant confirmed that a permit was issued to MONPER on January 28, 2025. Additionally, on February 26, 2025, MONPER commented using his Mr Satan YouTube account, "I have bought several guns and been stocking up on ammo since Trump got in office." Further, on March 13, 2025, MONPER commented using his account,

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² Google owns YouTube.

³ Of note, the birthday associated with MONPER's Mr Satan account is not his actual date of birth, nor is it associated with his father's date of birth. However, the remaining identifiers provided by Google relate directly to MONPER, to include his name, Google wallet, phone number, and e-mail addresses. Your affiant determined that MONPER lives with his father and that the father is the subscriber on file for the internet service provider. Your affiant believes, based upon training and experience, that MONPER provided a fictious date of birth for his Mr Satan account.

"Eventually im going to do a mass shooting." One week later, on March 20, 2025, MONPER commented using his account, "I have been buying 1 gun a month since the election, body armor, and ammo." Additional comments made by MONPER include his preference for .380 caliber weapons over 9mm caliber weapons, to include the .380 caliber being MANPOR's "favorite caliber" for every day carry.

- 17. On February 17, 2025, MONPER posted the following using his Mr Satan YouTube account:
 - (U) Comment ID: UgzuWRnNyW0y1aNq2eN4AaABAg.AEeeyrk2kEEAEehmXJBBQC Comment Date: 2025-02-17 14:26:48 EST Video comment was uploaded on: https://www.youtube.com/watch?v=sblK8473Qol Comment Text: Nah, we just need to start killing people, Trump, Elon, all the heads of agencies Trump appointed, and anyone who stands in the way. Remember, we are the majority, MAGA is a minority of the country, and by the time its time to make the move, they will be weakened, many will be crushed by these policies, and they will want revenge too. American Revolution 2.0
- 18. On March 4, 2025, MONPER posted the following using his Mr Satan YouTube account in a YouTube video titled, "Live: Trump's address to Congress":
 - (U) Comment ID: Ugyky_q2hjuldZigFIZ4AaABDqgBopajkQl Comment Date: 2025-03-04 19:33:51 EST Video comment was uploaded on: https://www.youtube.com/watch?v=9aothg6kJ6w Comment Text: im gonna assassinate him myself
- 19. On March 18, 2025, MONPER posted the following using his Mr Satan YouTube account in a YouTube video titled, "Trump Prepares for BENCHSLAP as Hearing ERUPTS INTO CHAOS":
 - (U) Comment ID: Ugzrti3F6fSKK8tahml4AaABAg
 Comment Date: 2025-03-18 7:41:46 EST
 Video comment was uploaded on: https://www.youtube.com/watch?v=UhFgi5FVKDk
 Comment Text: ICE are terrorist people, we need to start killing them.
- 20. On April 1, 2025, MONPER posted the following using his Mr Satan YouTube account:

(U) Comment ID: UgyGi-6bMcsw69tXLUI4AaABAg

Comment Date: 2025-04-01 16:45:59 EST

Video comment was uploaded on: https://www.youtube.com/watch?v=oxHaZfRXYVA Comment Text: If I see an armed ice agent, I will consider it a domestic terrorist, and an active

shooter and open fire on them.

IV. **CONCLUSION**

21. Based on the aforementioned information, I respectfully submit that there is

probable cause to believe that SHAWN MONPER violated Title 18, United States Code,

§ 115(a)(1)(B).

The above information is true and correct to the best of my knowledge, information and

belief.

/s/Ryan J. Chrobak

Special Agent

Federal Bureau of Investigation

The Affiant attested to this Affidavit By telephone pursuant to FRCP 4.1(b)(2)(A)9th day of April, 2025.

HONORABLE CHRISTOPHER B. BROWN

United States Magistrate Judge

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